

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

**IN RE: ASBESTOS PRODUCTS  
LIABILITY LITIGATION**

MDL DOCKET NO. 875

**GRADY O. HUMPHREYS, et al., vs.  
A.O. SMITH ELECTRICAL  
PRODUCTS COMPANY, et al.**

THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA

**GRADY O. HUMPHREYS, et al.,**

**Plaintiffs,**

**vs.**

**CIVIL ACTION NO.  
2:07-CV-607-WKW**

**ASBESTOS DEFENDANTS:  
A. O. SMITH ELECTRICAL PRODUCTS  
COMPANY, a division of A.O. SMITH  
CORPORATION, et al.,**

Defendants.

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**JOINDER AND ADOPTION IN AMERICAN OPTICAL CORPORATION'S MOTION  
TO DISMISS OR, IN THE ALTERNATIVE, MOTION FOR MORE DEFINITE  
STATEMENT AND/OR MOTION FOR SEVERANCE**

COME NOW Defendants Union Carbide Corporation, Foseco, Inc., and Maremont Corporation and hereby join in and adopt as though fully set forth American Optical Corporation's Motion to Dismiss or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein on February 18, 2008.

WHEREFORE, for all the arguments, citations to authority and for all other grounds the court deems applicable, Defendants Union Carbide Corporation, Foseco, Inc., and Maremont

Corporation respectfully request this Honorable Court to grant American Optical Corporation's Motion to Dismiss or, in the Alternative, Motion for More Definite Statement and/or Motion for Severance filed herein and to further grant all additional relief this Honorable Court deems necessary and proper.

Respectfully submitted this 10th day of March, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher (FLE 019)

AL Bar No. ASB-1485-C19E

Elizabeth B. Padgett (PAD015)

Alabama Bar No. ASB-3936-C60P

Counsel for Foseco, Inc., Maremont Corporation  
and Union Carbide Corporation

4000 SunTrust Plaza  
303 Peachtree Street, N.E.  
Atlanta, GA 30308-3243  
404/614-7400

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this date served the foregoing on all counsel by electronic filing and served Plaintiffs' counsel at the following address by U. S. Mail, with proper postage affixed:

G. Patterson Keahey, Jr.  
Law Offices of G. Patterson Keahey, P.C.  
One Independence Plaza, Suite 612  
Birmingham, AL 35209

This 10<sup>th</sup> day of March, 2008.

**HAWKINS & PARNELL, LLP**

/s/ Evelyn M. Fletcher

Evelyn M. Fletcher (FLE019)

AL Bar No. ASB-1485-C19E  
Elizabeth B. Padgett (PAD 015)  
Alabama Bar No. ASB-3936-C60P

Counsel for Foseco, Inc., Maremont Corporation  
and Union Carbide Corporation

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Atlanta, GA 30308-3243  
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